



SUSTAINABLE CHEMICAL PRODUCT
INNOVATION AND DEVELOPMENT

April 7, 2010

Via Hand Delivery

Document Processing Desk (DCI/PRD)
Ms. Molly Clayton, Chemical Review Manager
U.S. Environmental Protection Agency
Office of Pesticide Programs (7508P)
One Potomac Yard (South Building)
2777 South Crystal Drive
Arlington, Virginia 22202

Re: p-Dichlorobenzene Generic DCI 90-Day Response for EPA
Registration Number 81433-1, GDCI-061501-28450

Dear Ms. Clayton:

On behalf of our client, IMS Trading, L.L.C. (IMS), The Acta Group, L.L.C. submits the following documents, which constitute IMS' 90-day response to the p-Dichlorobenzene Generic Data Call-In (DCI) 90-Day Response for EPA Registration Number 81433-1, DCI Identity # GDCI-061501-28450:

- Data Call-In Response form for EPA Registration Number 81433-1;
- Requirements Status and Registrant's Response form for p-Dichlorobenzene;
- EPA Form 8570-32, Certification of Attempt to Enter into an Agreement with Registrants for Development of Data; and
- A copy of an offer to pay data development costs letter sent by certified mail.

The Acta Group, L.L.C.
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Suite 300
Washington, D.C. 20036
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If you have any questions or comments concerning this 90-day DCI response, please call Mr. Michael Ghesser, IMS Executive Vice President -- Operations, at (323) 938-8868, my colleague Sheryl Lindros Dolan at (202) 266-5031, or me at (301) 865-9090.

Sincerely,

A handwritten signature in dark ink, reading "Henry M. Jacoby". The signature is written in a cursive, flowing style.

Henry M. Jacoby

Attachments

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0174

OMB Approval 2070-0107
OMB Approval 2070-0057

DATA CALL-IN RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address IMS TRADING, LLC 6010 WEST WILSHIRE BOULEVARD, #400 LOS ANGELES, CA 90036		2. Case # and Name 3058 p-Dichlorobenzene Chemical # and Name 061501 Paradichlorobenzene		3. Date and Type of DCI and Number 07-Jan-2010 GENERIC ID # GDCI-061501-28450	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
81433-1			✓	N.A.	N.A.
8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative <u>Michael Shessey</u> Exec. Vice President - Operations				9. Date April 7, 2010	
10. Name of Company IMS Trading, L.L.C.				11. Phone Number (323) 938-8868	

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0174

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address IMS TRADING, LLC 6010 WEST WILSHIRE BOULEVARD, #400 LOS ANGELES, CA 90036		2. Case # and Name 3058 p-Dichlorobenzene Chemical # and Name 061501 Paradichlorobenzene			3. Date and Type of DCI and Number 07-Jan-2010 GENERIC ID # GDCI-061501-28450				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
875.2500	<u>Post-Application Exposure Data Requirements (Conventional Chemical)</u> Inhalation exposure (1,2,3,4)					HH, O	TEP	24	3
830.7050	<u>Product Chemistry Data Requirements (Conventional Chemical)</u> UV/Visible absorption					HH, O	TGA/PAI	8	3
870.7800	<u>Toxicology Data Requirements (Conventional Chemical)</u> Immunotoxicity					HH, O	TGA	24	3
10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law Signature and Title of Company's Authorized Representative <u>Michael Shesser</u> Exec. Vice Pres. - Operations							11. Date April 7, 2010		
12. Name of Company IMS Trading L.L.C.							13. Phone Number (323) 938-8868		



United States Environmental Protection Agency
Washington, D.C. 20460
CERTIFICATION OF ATTEMPT TO ENTER INTO AN
AGREEMENT WITH REGISTRANTS FOR
DEVELOPMENT OF DATA

Form Approved.

OMB Nos. 2070-0057;
2070-0107; 2070-0122;
2070-0164

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 15 minutes per response including time for reading the instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

Please fill in blanks below

Company Name

IMS Trading L.L.C.

Company Number

81433

Chemical Name

para-dichlorobenzene

EPA Chemical Number

61501

I Certify that:

My company is willing to develop and submit the data required by EPA under the authority of the Federal Insecticide, Rodenticide and Fungicide Act (FIFRA), if necessary. However, my company would prefer to enter into an agreement with one or more registrants to develop jointly or share in the cost of developing data.

My firm has offered in writing to enter into such an agreement. That offer was irrevocable and included an offer to be bound by arbitration under section 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms could not be reached otherwise. This offer was made to the following firm(s) on the following date(s):

Name of Firm(s)

Jiangsu Yangnong Chemical Co., Ltd.
c/o Landis International, Inc.
PO Box 5126
3185 Madison Highway
Valdosta, GA 31603-5126

Date of Offer

April 7, 2010

Certification:

I certify that I am duly authorized to represent the company name above, and that the statements that I have made on this form and all attachments therein are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature of Company's Authorized Representative

Michael Ghesser

Date

April 7, 2010

Name and Title (Please Print or Type)

Michael Ghesser, Executive Vice President



6010 Wilshire Blvd., Suite 400
Los Angeles, CA 90036
PH (323) 938-8868
FX (323) 938-8878

April 7, 2010

Via E-Mail and Certified Mail (Return Receipt Requested)

Jiangsu Yangnong Chemical Co., Ltd.
c/o Landis International, Inc.
P.O. Box 5126
3185 Madison Highway
Valdosta, GA 31603-5126

Re Offer to Share Costs in Development of Data

Dear Ron:

This letter follows up on IMS Trading L.L.C.'s (IMS) ongoing communications with you and Ralph Carmichael regarding the U.S. Environmental Protection Agency's (EPA) Generic Data Call-In (DCI) for paradichlorobenzene (PDCB). IMS wishes to reaffirm IMS' commitment to work with Jiangsu Yangnong Chemical Company, Ltd. and potentially other PDCB registrants to enter into a data cost sharing agreement to develop the outstanding supporting data required by the DCI. IMS hereby offers to pay, to the extent required by FIFRA Section 3(c)(2)(B), for its portion of the test costs and agrees to be bound by arbitration under FIFRA Section 3(c)(2)(B)(iii) if a final data cost sharing agreement on all terms cannot be reached. IMS looks forward to continuing working with your company to complete this agreement. We would appreciate if you could send an e-mail as soon as possible acknowledging receipt of this letter.

Sincerely,

A handwritten signature in dark ink that reads 'Michael Ghesser'. The signature is fluid and cursive, with the first name 'Michael' and last name 'Ghesser' clearly distinguishable.

Michael Ghesser

cc: Mr. Ralph Carmichael